

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID ST. GEORGE

No. 18-mj-05122-JGD

**ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant, with the assent of the government and U.S. Probation, respectfully requests that his release conditions be modified to remove the condition that he reside with a third-party custodian.

As grounds therefor, it is the understanding of undersigned counsel that the Court imposed the third-party custodian condition, which was not requested by the government or Probation, out of appropriate concern for the defendant's well-being in the immediate aftermath of his arrest. Now, however, the passage of time has made clear that Mr. St. George is stable and handling his legal and personal situation as well as can be expected. He is also now engaged in appropriate therapy. At this juncture, the presence of a third-party custodian is, if anything, any unnecessary source of stress for an individual who has lived independently for his entire adult life. Mr. St. George remains subject to electronic monitoring and a substantial secured bond to assure his compliance with release conditions.

WHEREFORE, the assented-to request to modify release conditions should be granted.

Respectfully submitted,

DAVID ST. GEORGE  
by his attorney,

/s/ William Fick  
WILLIAM W. FICK, ESQ. (BBO # 650562)

FICK & MARX LLP  
24 Federal Street, 4th Floor  
Boston, MA 02110  
(857) 321-8360  
WFICK@FICKMARX.COM

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 19, 2018. A copy is also being sent by e-mail PDF to USPO Chrissy Murphy.

/s/ William Fick